

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

KAREN STREET,

Defendants.

NO. CR17-106 TSZ

PROTECTIVE ORDER

This matter comes before the Court on the Stipulated Motion, docket no. 22, for a Discovery Protective Order. Having considered the entirety of the record and being fully advised in this matter, the Court hereby enters the following Discovery Protective Order:

DISCOVERY PROTECTIVE ORDER

A. Definitions

As used in this Order, the term “Protected Information” means any date of birth, Social Security number, driver’s license number, bank account number, credit card number, personal identification number, address, telephone number, name and/or location of employment, criminal history record, background check, immigration history/status, and/or any other similar information or number implicating a privacy interest of and belonging to an individual, business, partnership, or corporation.

1 As used in this Order, the term “Protected Material” means any document or other
2 record containing or reflecting Protected Information.

3 **B. Permissible Disclosure of Protected Information and Protected**
4 **Material**

5 The United States will make available copies of the Protected Material to defense
6 counsel to comply with the government’s discovery obligations. Possession of the
7 Protected Material is limited to defense counsel, investigators, paralegals, assistants, law
8 clerks, and experts (hereinafter collectively “members of the defense team”).

9 Members of the defense team may not provide copies of the Protected Material to
10 other persons, including Defendant herself. Members of the defense team may review
11 Protected Information and/or Protected Material with Defendant. Defendant may visually
12 inspect and review such documents in the presence of defense counsel or another member
13 of the defense team, but shall not be allowed to possess Protected Information (such as
14 unredacted copies of Protected Material, notes, copies, or photographs of such Protected
15 Material containing Protected Information). Defendant may possess documents from
16 which all Protected Information have been redacted.

17 Members of the defense team may review or discuss the contents of documents
18 containing Protected Material with any prospective witness, as long as they do not share
19 the unredacted documents, or share any Protected Information with any prospective
20 witness.

21 **C. Filing**

22 If any Protected Information or Protected Material is filed in court or otherwise
23 disseminated as part of litigation, the parties shall redact such information prior to filing;
24 unless, based on a party’s application prior to filing, the Court finds that an unredacted
25 filing is necessary and appropriate.

26 **D. Maintenance**

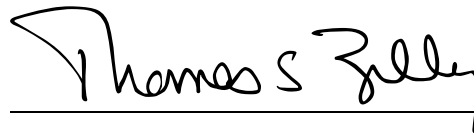
27 Members of the defense team shall keep any Protected Material secured whenever
28 it is not being used in furtherance of their work in the above-captioned case.

1 All documents containing Protected Material shall be returned to the United
2 States, or destroyed, once all charges are resolved by dismissal or by final conviction.
3 The provisions of this Order shall not terminate at the conclusion of this prosecution.

4 **E. Modification**

5 The parties agree that this Protective Order may be modified, as necessary, by
6 filing with the Court a Stipulated Order Modifying the Protective Order, or by other order
7 of the Court.

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9 DATED this 31st day of August, 2017.

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11 Thomas S. Zilly
12 United States District Judge
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17 Presented by:

18
19 /s/ Seungjae Lee

20 SEUNGJAE LEE

21 Assistant United States Attorney
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